

CONFIDENTIAL – ATTORNEYS’ EYES ONLY

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December 18, 2014

By E-mail

John Shaeffer, Esq.
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1888 Century Park East
Suite 1000
Los Angeles, CA 90067

Re: *TVIIM, LLC v. McAfee, Inc.*, No. 3:13-cv-4545-VCC (N.D. Cal.)

Dear John:

Pursuant to the parties’ agreement regarding McAfee not referring to individuals’ names in its public filing regarding its inequitable conduct defense—which McAfee proposed as a courtesy to these individuals—McAfee accordingly omitted those names in its filing. The relevant individuals are Bruce Hartley, Eric Knight, and Kevin Reynolds. As examples of their relationship to the allegations in McAfee’s First Amended Answer, Defenses, and Counterclaims to First Amended Complaint:

- ¶ 20: Dr. Hartley, Mr. Knight, and Mr. Reynolds worked on (in various capacities) the development of HostGUARD.
- ¶ 23: Dr. Hartley reviewed the HostGUARD marketing materials while he was employed by Trident.
- ¶ 24: Dr. Hartley, Mr. Knight, and Mr. Reynolds were employees of DMW, and were involved with or aware of HostCHECK.

Sincerely,



Joseph J. Mueller

cc: Counsel of Record (via email)